

SHS-11

May 30, 1989

Peter J. Vagt, PhD  
Warzyn Engineering Inc.  
One Pierce Place  
Suite 1110  
Itasca, Illinois 60143-2681

RE: Health and Safety Plan  
American Chemical Services Site  
Griffith, Indiana

Dear Dr. Vagt:

I have completed my review of the Health and Safety Plan (HSP) for the American Chemical Services Site, Remedial Investigation/Feasibility Study (RI/FS). Overall, the HSP appears to address the site's major health and safety concerns and hazards which may be encountered during the RI/FS process. However, I do have a few recommendations and requirements concerning the HSP that I wish to pass on to you:

1. Page 17, Paragraph 7 - If the IEL exceeds 25 percent and remains above that level for an extended period (as defined in the referenced paragraph), the site safety officer will inform the RPM of the exceedance and consult with the RPM to discuss any actions that may be taken by the site safety officer in response to the situation.
2. Page 17, Paragraph 8 - Many HNus have an adjustable alarm that will sound if a certain ambient concentration (such as 5 ppm) is encountered during an HNu survey. If possible, it is recommended that HNus with adjustable alarms be used in the field during excavation and boring exercises. This will allow less concentrated effort on the part of the HNu operator and will also act as a definite warning device for workers near the "hot zone" in case of high ambient concentrations.
3. Page 18, Paragraph "RAD-MINI" - If the RAD-MINI readings exceed background at the site, the RPM is to be consulted and made aware of the higher readings. Upon noticing any higher than background readings, it may be useful to use the RAD-MINI to locate any possible source areas (by use of equipotential contour mapping) to ensure a minimum of exposure to radioactive source materials.
4. Page 23, Paragraph 3 - It is recommended that at least Level "C" equipment be worn during the installation of wells, and during the taking of soil borings in areas that are suspected of containing buried wastes, or are near the suspected perimeters of waste burial. It is also recommended that an HNu with a set alarm feature, be placed on the drilling rig floor, to continually monitor the materials coming

from the subsurface. This will possibly allow a more immediate upgrade to Level B.

In closing, as we discussed on the telephone recently, we need to set a date for a "staking visit" to confirm the locations where samples and piezometers will be placed. It would be best if the staking visit were to take place just prior to the taking of field samples. Since it is anticipated that site mobilization and the taking of field samples will begin on or after June 19, it may be beneficial to conduct the staking visit during the week of June 12th. A preferable day during that week would be June 14th. Please contact me to confirm a date for this visit.

If you have any questions concerning the HSP recommendations, please contact me at 886-5116.

Sincerely,

Robert E. Swale  
Remedial Project Manager

cc: Andrew Perellis, Esquire  
Swapam Ghosh, IDEM

bcc: Jan Carlson, ORC  
Kerry Street, RERB